

United States District Court
Northern District of Illinois
Eastern Division

United States of America,

Plaintiff,

v.

Albert Rossini,

Defendant.

No. 17 cr 00522

Judge John J. Tharp, Jr.

Motion for Extension of Time to File Post Trial Motion

Counsel for Defendant Albert Rossini respectfully requests an extension of time to file his post-trial motions in this matter. Motions are currently due on October 6, 2023. Counsel expected to be able to complete the motion by the current deadline and has begun working on the motion. However, unfortunately, two of the attorneys in our office were unavailable this past week (for bereavement leave and illness cause by the Covid-19 virus), and undersigned counsel had obligations in other matters which precluded her from being able to complete this motion.

An extension to October 20, 2023, should be sufficient to complete and file the motion, with a corresponding extension to the government's response deadlines.

Respectfully Submitted,

/s/ Erin L. Sostock
Attorney for Albert Rossini

Erin L. Sostock
James G. Vanzant
Blaine & Vanzant, LLP
922 Davis Street
Evanston, Illinois 60201
(312) 788-7584
els@blainevanzant.com
jgv@blainevanzant.com